

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA

THE CITY OF HUNTINGTON,  
Plaintiff,

v.

Civil Action No. 3:17-01362

AMERISOURCEBERGEN DRUG  
CORPORATION, *et al.*,  
Defendants.

---

CABELL COUNTY COMMISSION,  
Plaintiff,

v.

Civil Action No. 3:17-01665

AMERISOURCEBERGEN DRUG  
CORPORATION, *et al.*,  
Defendants.

**PLAINTIFFS' AMENDED NOTICE OF 30(b)(6) DEPOSITION  
OF THE HEALTHCARE DISTRIBUTION ALLIANCE**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), and the Deposition Protocol governing this litigation, Plaintiffs the City of Huntington and Cabell County Commission, by and through undersigned counsel, hereby give notice that the oral videotaped deposition will be taken of one or more officers, directors, or managing agents, or other persons designated by the Healthcare Distribution Alliance, upon the particular topics identified in Attachment A to the Amended Subpoena, attached hereto as Exhibit 1. The deposition will be held on **October 1, 2020 at 10:00 AM (Eastern Standard Time)** at Baron & Budd, P.C., located at 600 New Hampshire Avenue NW, 10th Floor, Washington, DC 20037.

The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not

counsel of record or interested in the events of this case. The oral examination is to be taken for purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, the local rules of the United States District Court for the Southern District of West Virginia, and all Pretrial Orders and Case Management Orders entered by the Court. Court reporting services and video recording services will be provided by Golkow Global Litigation Services. Parties who wish to attend may RSVP to the deposition by emailing [scheduling@golkow.com](mailto:scheduling@golkow.com).

Dated: September 21, 2020

Respectfully submitted,

THE CITY OF HUNTINGTON

/s/ Anne McGinness Kearse

Anne McGinness Kearse (WVSB No. 12547)

Joseph F. Rice

**MOTLEY RICE LLC**

28 Bridgeside Blvd.

Mount Pleasant, SC 29464

Tel: 843-216-9000

Fax: 843-216-9450

[akearse@motleyrice.com](mailto:akearse@motleyrice.com)

[jrice@motleyrice.com](mailto:jrice@motleyrice.com)

Linda Singer

David I. Ackerman

**MOTLEY RICE LLC**

401 9th Street NW, Suite 1001

Washington, DC 20004

Tel: 202-232-5504

Fax: 202-386-9622

[lsinger@motleyrice.com](mailto:lsinger@motleyrice.com)

[dackerman@motleyrice.com](mailto:dackerman@motleyrice.com)

Charles R. "Rusty" Webb (WVSB No. 4782)

**THE WEBB LAW CENTRE, PLLC**

716 Lee Street, East

Charleston, West Virginia 25301

Telephone: (304) 344-9322

Facsimile: (304) 344-1157

[rusty@rustywebb.com](mailto:rusty@rustywebb.com)

CABELL COUNTY COMMISSION

/s/ Paul T. Farrell, Jr.

Paul T. Farrell, Jr. (WVSB Bar No. 7443)

**FARRELL LAW**

P.O. Box 1180

Huntington, WV 25714-1180

422 Ninth Street, 3rd Floor

Huntington, West Virginia 25701

office: 304.523.7285

cell: 304.654.8281

email: [paul@farrell.law](mailto:paul@farrell.law)

Michael A. Woelfel (W.Va. Bar ID 4106)

**WOELFEL AND WOELFEL, LLP**

801 Eighth Street

Huntington, West Virginia 25701

304.522.6249

304.522.9282: fax

[mikewoelfel3@gmail.com](mailto:mikewoelfel3@gmail.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on September 21, 2020, the foregoing Plaintiffs' Amended Notice of 30(b)(6) Deposition of the Healthcare Distribution Alliance was filed electronically via the CM/ECF electronic filing system and served on all counsel registered in the system as well as on all counsel via email to plaintiffs' listserv at [mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com) and defendants' listservs at [track2opioddefendants@reedsmith.com](mailto:track2opioddefendants@reedsmith.com).

/s/ Monique Christenson  
Monique Christenson (SC Bar No. 104063)  
**MOTLEY RICE LLC**